

Final Report: Missouri Child and Family Services Review Executive Summary

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Missouri. The CFSR assesses State performance on seven child welfare outcomes pertaining to children's safety, permanency, and well being and on seven systemic factors related to the State's capacity to achieve positive outcomes for children and families. The Missouri CFSR was conducted the week of December 8, 2003 (in Federal fiscal year 2004). The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the Department of Social Services, Children's Division (CD).
- The State Data Profile, prepared by the Children's Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 1999 through 2002;
- Reviews of 50 cases at three sites in the State (Jackson County [Kansas City], Jasper County, and St. Louis County).
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys.

A key finding of the Missouri CFSR was that the State is not in substantial conformity with the seven child welfare outcomes assessed through the CFSR. However, in one of the CFSR sites (Jasper County) case review findings revealed that the site met the criteria for substantial conformity for Safety Outcome 1 (Children are first and foremost protected from abuse and neglect), Safety Outcome 2 (Children are safely maintained in their homes whenever possible and appropriate), Well-Being Outcome 2 (Children receive appropriate services to meet their educational needs), and Well-Being Outcome 3 (Children receive adequate services to meet their physical and mental health needs). In that site, 100 percent of the cases reviewed were rated as a Strength for 12 of the 23 items.

Despite the high level of performance of the Jasper County site on many outcomes, the performance of all three sites was quite low for Permanency Outcome 1 (Children have permanency and stability in their living situations). This outcome was determined to be substantially achieved in only 34.6 percent of the foster care cases reviewed. The outcome was substantially achieved in 58 percent of Jackson County cases, 17 percent of Jasper County cases, and 12.5 percent of St. Louis County cases. Although information from the State Data Profile and the CFSR case reviews indicates that CD has achieved success in ensuring that children who leave foster care do not re-enter within 12 months, CFSR findings also demonstrate that CD is not consistent in its efforts to establish appropriate permanency goals in a timely manner or achieve permanency for children (through adoption, reunification, guardianship, or permanent placement with relatives) in a timely manner.

Case review and stakeholder interview findings suggest that barriers to achieving permanency in a timely manner can be attributed to a tension between CD and the courts with regard to adherence to the provisions of ASFA. Stakeholders noted that some courts in the State do not support the Federal timeframes pertaining to permanency established by the Adoption and Safe Families Act. Although the agency and the courts engage in several joint initiatives, the achievement of permanency is hampered by a lack of clarity regarding the respective roles of child welfare children's service workers and court personnel in making permanency decisions.

Stakeholders also expressed the opinion that key barriers to achieving adoptions in a timely manner pertain to the process of filing for termination of parental rights (TPR). Stakeholders reported that in many instances, CD does not file for TPR in a timely manner due to the following factors: (1) an insufficient number of State attorneys assigned to represent the agency in all court matters, including filing for TPR; (2) a perception of the agency and the courts that children age 12 and older and children with behavioral issues are "unadoptable;" and (3) an unwillingness on the part of the courts to hear a TPR petition unless an adoptive family has been identified for the child.

Another area of concern with regard to State performance on the child welfare outcomes pertained to Well-Being Outcome 1 (Families have enhanced capacity to provide for their children's needs). This outcome was determined to be substantially achieved in only 42.0 percent of the cases reviewed. Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 83 percent of Jasper County cases, compared to 29 percent of Jackson County and St. Louis County cases. CFSR findings for this outcome indicate that CD is not consistent in meeting the services needs of children, parents, and foster parents; involving children and parents in the case planning process; and ensuring that agency social workers have sufficient contact with the children and parents in their caseloads.

In addition to the concerns pertaining to permanency and well-being, CFSR findings indicate that CD is not consistent in its efforts to address the safety concerns of children who come into contact with the child welfare system. Case review findings indicate that CD is not initiating responses to maltreatment reports in accordance with State-established timeframes on a consistent basis (item 1), and that some children are not being sufficiently protected from risk of harm while in their own homes (items 3 and 4). In addition, the State did not meet the national standards for either the rate of recurrence of a substantiated maltreatment within 6 months or the incidence of maltreatment in foster care by foster parents or facility staff.

With regard to the systemic factors, the CFSR determined that the State is in substantial conformity with the factors of Statewide Information System; Quality Assurance System; Training; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State did not achieve substantial conformity with the systemic factors of Case Review System or Service Array.

The overall findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR. A summary of major findings is presented below.

I. KEY FINDINGS RELATED TO OUTCOMES

Safety Outcome 1: Children are first and foremost protected from abuse and neglect.

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to whether children experience a recurrence of substantiated or indicated maltreatment (item 2).

Missouri did not achieve substantial conformity with Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 78.7 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.
- The State did not meet the national standard for (1) the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period or (2) the percentage of children experiencing substantiated maltreatment by a foster parent or facility staff.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 92 percent of Jasper County cases and 91 percent of St. Louis County cases, compared to 67 percent of Jackson County cases.

A key CFSR finding is that CD is not consistent with regard to initiating investigations of child maltreatment reports or establishing face-to-face contact with the child subject of the report in accordance with the State-established timeframes. In addition, both the State Data Profile and case reviews indicate that CD is not effective in preventing the recurrence of child maltreatment within a 6-month period. Repeat maltreatment within a 6-month period occurred in 8 (53%) of the 15 cases in which there was at least 1 substantiated maltreatment report during the period under review. Six of these cases were in Jackson County.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate.

Performance on Safety Outcome 2 is assessed through two indicators. One indicator (item 3) addresses the issue of the child welfare agency's efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the child welfare agency's effectiveness in reducing risk of harm to children.

Missouri did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 70.0 percent of the applicable cases reviewed, which does not meet the 90 percent required for a rating of substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was rated as a Strength in 100 percent of Jasper County cases, compared to 71 percent of St. Louis County cases and 54 percent of Jackson County cases.

A key concern identified during the CFSR pertained to a lack of service provision. Case reviews found that although families were being assessed for service needs, in several cases, services were not provided to either the children or the parents, particularly in the in-home services cases. Consequently, risk of harm was not adequately addressed.

Permanency Outcome 1: Children have permanency and stability in their living situations.

There are six indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain to the child welfare agency's effectiveness in preventing foster care re-entry (item 5), ensuring placement stability for children in foster care (item 6), and establishing appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on the child welfare agency's success in achieving permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or whether children who have "other planned living arrangements" as a case goal are in stable placements and adequately prepared for eventual independent living (item 10).

Missouri did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 34.6 percent of the cases, which is less than the 90 percent required for substantial conformity.

- The State Data Profile indicates that for fiscal year (FY) 2002, the State did not meet the national standards for (1) the percentage of children reunified who were reunified within 12 months of the time of entry into foster care; (2) the percentage of children adopted who achieved a finalized adoption within 24 months of entry into foster care, or (3) the percentage of children in foster care for less than 12 months who experienced no more than 2 placements.

The FY 2002 data provided in the State Data Profile indicate that the State meets the national standard for the percentage of children entering foster care who were re-entering within 12 months of a prior foster care episode.

Although performance on this outcome was generally quite low, there was variation across CFSR sites. The outcome was determined to be substantially achieved in 58 percent of Jackson County cases, compared to 17 percent of Jasper County cases and 12.5 percent of St. Louis County cases.

A key finding of the CFSR was that CD is effective in preventing re-entry into foster care (item 5). However, all other indicators for this outcome were rated as Areas Needing Improvement. Case reviewers determined that CD was not consistent in its efforts to (1) ensure children's placement stability while in foster care (item 6), (2) establish appropriate permanency goals in a timely manner (item 7), and (3) achieve children's permanency goals in a timely manner (items 8, 9, and 10).

Information from the case reviews and stakeholder interviews suggests that key barriers to attaining permanency in a timely manner are: (1) the fact that some courts in the State do not adhere to the timeframes pertaining to permanency established by the Adoption and Safe Families Act, (2) the insufficient number of State attorneys representing the child welfare agency in all court matters (resulting in continuances and ongoing delays), and (3) the unwillingness of some courts to hear TPR petitions if an adoptive family has not been found for the child.

Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.

Permanency Outcome 2 incorporates six indicators that assess the child welfare agency's performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Missouri did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 61.5 percent of the cases, which is less than the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 83 percent of Jasper County cases, compared to 58 percent of Jackson County cases, and 50 percent of St. Louis County cases.

CFSR case review findings indicate that CD makes concerted efforts to place children in close proximity to their families. However, the findings also indicate a lack of consistent effort on the part of CD to (1) place siblings together in foster care; (2) promote frequent visitation between children and their parents and siblings in foster care, (3) seek and assess relatives as placement resources, (4) preserve children's connections to their families and heritage, and (5) support or promote the parent-child relationship.

Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

Well Being Outcome 1 incorporates four indicators. One pertains to the child welfare agency's efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator examines the child welfare agency's effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker's contacts with the children in their caseloads (item 19) and with the children's parents (item 20).

Missouri did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 42.0 percent of the cases reviewed, which is less than the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 83 percent of Jasper County cases, compared to 29 percent of Jackson County and St. Louis County cases.

A key CFSR finding is that all indicators for Well-Being Outcome 1 were rated as an Area Needing Improvement. Case reviews found that CD was not consistent in its efforts to assess children and families for services and provide necessary services, involve parents and children in the case planning process, and establish sufficient face-to-face contact between agency children's service workers and the children and parents in their caseloads.

Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.

There is only one indicator for Well-Being Outcome 2. It pertains to the child welfare agency's effectiveness in addressing and meeting the educational needs of children in both foster care and in-home services cases (item 21).

Missouri did not achieve substantial conformity with Well-Being Outcome 2. This determination is based on the finding that the outcome was achieved in 80.0 percent of the cases reviewed, which does not meet the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 100 percent of Jasper County cases and 81 percent of Jackson County cases, compared to 62.5 percent of St. Louis County cases.

A key CFSR finding was that, although the educational outcome was achieved in 80.0 percent of the cases, CD is not consistent in meeting children's educational needs across all of the sites. Findings show that the State did not consistently address truancy and educational neglect for children served in the in-home services cases selected for review.

Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

This outcome incorporates two indicators that assess the child welfare agency's efforts to meet children's physical health (item 22) and mental health (item 23) needs.

Missouri did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 71.4 percent of the applicable cases, which is less than the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 92 percent of Jasper County cases, compared to 70 percent of Jackson County cases and 57 percent of St. Louis County cases.

The CFSR case reviews found that CD was not consistently effective in meeting children's physical and mental health needs. A particular concern pertained to the mental health needs of children in the in-home services cases. In many of those cases, reviewers determined that a mental health assessment and/or mental health services were warranted, but the agency did not respond.

II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

Statewide Information System

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a Statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care (item 24).

Missouri achieved substantial conformity with the systemic factor of Statewide Information System. The CFSR determined that the State's information system can readily identify the status, demographic characteristics, location, and goals for children in foster care.

Case Review System

Five indicators are used to assess the State's performance with regard to the systemic factor of Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR) in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

Missouri is not in substantial conformity with the systemic factor of Case Review System. This determination is based on the following CFSR findings:

- Case plans are not developed jointly with the child's parent on a consistent basis.
- The 6-month case reviews are conducted through Family Support Team meetings, but these are not always held in a timely manner and often do not meet the Federal requirement that a person who is not involved in the case must be a participant in the review (i.e., a third-party participant).
- The State has not established a process that ensures that each child in foster care has a permanency hearing no later than 12 months from the date a child enters foster care and no less frequently than every 12 months thereafter and that ensures that 12-month hearings involve full hearings and not just paper reviews.
- This item is rated as an Area Needing Improvement because CFSR findings indicate that the State does not comply with TPR proceedings in accordance with the provisions of ASFA.
- The State does not have a statewide process to ensure that caregivers are notified regarding hearings and reviews on a consistent basis and that they are routinely given the opportunity to be heard in court hearings. Although there is a State

statute requiring notification, the statute does not specify who (i.e., child welfare agency or court) has the responsibility for notification.

Quality Assurance System

Performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30), and whether the State is operating a statewide quality assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Missouri is in substantial conformity with the systemic factor of Quality Assurance System. The CFSR determined that the State has standards to protect the safety and health of children and that the State has a statewide quality assurance system that focuses on outcomes and uses data and case reviews to improve performance with regard to achieving safety, permanency, and well-being outcomes for children.

Training

The systemic factor of Training incorporates an assessment of the State's new caseworker training program (item 32), ongoing training for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

Missouri achieved substantial conformity with the systemic factor of Training. The CFSR determined that children's service workers receive initial training that supports the goals and objectives of the agency and usually they are required to complete the training before being assigned cases. The CFSR also found that the State provides both pre-placement and ongoing training to foster and adoptive parents that is available statewide. However, CFSR findings indicate that although ongoing training opportunities are made available to staff, ongoing training is not mandated. Consequently, many children's service workers and supervisors do not participate in ongoing training. In addition, training for new supervisors is no longer provided due to budget cuts.

Service Array

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services to meet the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Missouri did not achieve substantial conformity with the systemic factor of Service Array. The CFSR determined that the State has critical gaps in its service array, particularly in the areas of mental health services and substance abuse treatment. In addition, services are not consistently accessible to children and families on a statewide basis. Families in rural communities, in particular, have difficulty accessing a full array of services, such as crisis intervention and family reunification services. Finally, the CFSR found that services are not consistently individualized to meet the needs of families and children.

Agency Responsiveness to the Community

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally-assisted programs serving the same population (item 40).

Missouri is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. The CFSR determined that the State engages in ongoing consultation with stakeholders and uses their input in developing the State's 5-year plan and preparing progress reports. CFSR findings also indicate that the CD has implemented or is part of a number of efforts to coordinate and integrate services for the children and families that are served by various agencies.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children.

Missouri is in substantial conformity with the systemic factor pertaining to Foster and Adoptive Parent Licensing, Recruitment and Retention. The CFSR determined that Missouri has implemented comprehensive standards for licensing foster family homes and child care institutions and that these standards are consistently applied to all foster homes and child care institutions receiving title IV-E and IV-B funds. In addition, criminal background checks are consistently completed for prospective foster and adoptive parents and the State has a process in place that promotes use of cross-jurisdictional resources for placing children with foster and adoptive parents. However, the CFSR also determined that the State's recruitment and retention efforts are not meeting the need for an adequate pool of foster and adoptive homes.

Table 1. Missouri CFSR Ratings for Safety and Permanency Outcomes and Items

Outcomes and Indicators	Outcome Ratings			Item Ratings		
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards?</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect	No	78.7	No			
Item 1: Timeliness of investigations				ANI	67	
Item 2: Repeat maltreatment				ANI	83	No
Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate	No	70.0				
Item 3: Services to prevent removal				ANI	76	
Item 4: Risk of harm				ANI	72	
Permanency Outcome 1- Children have permanency and stability in their living situations	No	34.6	Met 1, did not meet 3			
Item 5: Foster care re-entry				Strength	100	Yes
Item 6: Stability of foster care placements				ANI	77	No
Item 7: Permanency goal for child				ANI	75	
Item 8: Reunification, guardianship and placement with relatives				ANI	50	No
Item 9: Adoption				ANI	12.5	No
Item 10: Other planned living arrangement				ANI	33	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved	No	61.5				
Item 11: Proximity of placement				Strength	95	
Item 12: Placement with siblings				ANI	79	
Item 13: Visiting with parents and siblings in foster care				ANI	70	
Item 14: Preserving connections				ANI	81	
Item 15: Relative placement				ANI	81	
Item 16: Relationship of child in care with parents				ANI	68	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI).

Table 2. Missouri CFSR Ratings for Child and Family Well Being Outcomes and Items

Outcomes and Indicators	Outcome Ratings		Item Ratings			
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Well Being Outcome 1 - Families have enhanced capacity to provide for children's needs	No	42.0				
Item 17: Needs/services of child, parents, and foster parents				ANI	54	
Item 18: Child/family involvement in case planning				ANI	56	
Item 19: Worker visits with child				ANI	62	
Item 20: Worker visits with parents				ANI	57	
Well Being Outcome 2 - Children receive services to meet their educational needs	No	80.0				
Item 21: Educational needs of child				ANI	80	
Well Being Outcome 3 - Children receive services to meet their physical and mental health needs are met	No	71.4				
Item 22: Physical health of child				ANI	82	
Item 23: Mental health of child				ANI	77.5	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI).

Table 3: Missouri Performance on the Six Outcome Measures for Which National Standards have been Established

Outcome Measure	National Standard	Missouri Data FY 2002
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	7.3%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	0.57% or less	0.62%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	8.5%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	65.9%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	30.3%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	78.7%

Table 4: Missouri CFSR Ratings for the Seven Systemic Factors

Systemic Factors	In Substantial Conformity?*	Rating**
IV. Statewide Information System	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
V. Case Review System	No (1)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		ANI
Item 27: Process for 12-month permanency hearings		ANI
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
VI. Quality Assurance System	Yes (4)	
Item 30: Standards to ensure quality services and ensure children's safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		Strength
VII. Training	Yes (3)	
Item 32: Provision of initial staff training		Strength
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		Strength
VIII. Service Array	No (1)	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		ANI
IX. Agency Responsiveness to the Community	Yes (4)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
X. Foster and Adoptive Parent Licensing, Recruitment and Retention	Yes (3)	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children's racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

*Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates "Not in Substantial Conformity." A rating of 3 or 4 indicates Substantial Conformity.

**Items may be rated as a Strength or an Area Needing Improvement (ANI).